ATTORNEY OR PARTY WITHOUT ATTORNEY (NAME AND ADDRESS): TELEPHONE: 6266168557 GUILLERMO DIAZ 555 WEST FIGUEROA DRIVE ALTADENA, CALIFORNIA 91001 ATTORNEY FOR (NAME):	*FOR COURT USE ONLY*
Insert name of court, judicial district or branch court, if any, and post office and street address: Los Angeles Superior Court – Chatsworth Branch 9425 Penfield Avenue, Chatsworth, CA 91311	
PLAINTIFF: American Express National Bank DEFENDANT: GUILLERMO DIAZ	
ANSWER—Contract [x] **TO COMPLAINT OF (name):** American Express National Bank [ ] **TO CROSS-COMPLAINT (name):**	CASE NUMBER: 24CHLC44199

1. This pleading, including attachments and exhibits, consists of the following number of pages: 2
2. DEFENDANT *(name):* Guillermo Diaz
   answers the complaint or cross-complaint as follows:
3. Check ONLY ONE of the next two boxes:
   a. [x] Defendant generally denies each statement of the complaint or cross-complaint. *(Do not check this box if the verified complaint or cross-complaint demands more than $1,000.)*
   b. [ ] Defendant admits that all of the statements of the complaint or cross-complaint are true EXCEPT:
      (1) Defendant claims the following statements are false *(use paragraph numbers or explain):*

[ ] Continued on Attachment 3.b.(1).

      (2) Defendant has no information or belief that the following statements are true, so defendant denies them (*use paragraph numbers or explain):*

[ ] Continued on Attachment 3.b.(2).

If this form is used to answer a cross-complaint, plaintiff means cross-complainant and defendant means cross-defendant.

Form Approved for Optional Use
Judicial Council of California
PLD-C-010 [Rev. January 1, 2007]

Code of Civil Procedure, § 425.12
www.courts.ca.gov

SHORT TITLE:	CASE NUMBER:
American Express National Bank vs. Guillermo Diaz	

ANSWER—Contract

4. [x] AFFIRMATIVE DEFENSES Defendant alleges the following additional reasons that plaintiff is not entitled to recover anything:

Defendant alleges the following additional reasons that plaintiff is not entitled to recover anything:

1. Plaintiff lacks standing to sue. American Express National Bank has not provided valid proof of assignment or ownership of the alleged debt.
2. Statute of limitations expired. The alleged debt is barred under California Code of Civil Procedure § 337 (4-year limit for written contracts).
3. Improper service of process. Defendant was not served in compliance with CCP § 415.20.
4. Defendant disputes the debt amount. Plaintiff has failed to provide an accurate accounting of the claimed debt.

[ ] Continued on Attachment 4.

5. [ ] Other

6. DEFENDANT PRAYS

a. that plaintiff take nothing.

b. [x] for costs of suit.

c. [x] other *(specify):*

Any other relief the court deems proper.

Guillermo Diaz

(Type or print name)

(Signature of party or attorney)

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